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**PRE-DISSEMINATION REVIEW GUIDELINES**  
**Review Guidelines to Ensure That Disseminated Information Is**  
**Consistent with EPA Information Quality Guidelines**

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**Purpose**

The Information Quality Guidelines (IQG or the Guidelines)<sup>1</sup> contain EPA's policy and procedural guidance for ensuring and maximizing the quality of information<sup>2</sup> we disseminate. As described in Section 7 of the IQG, pre-dissemination reviews are designed to provide additional assurance that information EPA disseminates to the public is consistent with the quality principles described in the IQG. Agency Program Offices, Regions and Labs ("Agency Offices") should develop pre-dissemination review procedures consistent with the Guidelines and their respective authorities and activities.

EPA's Office of Environmental Information (OEI) is providing these pre-dissemination review guidelines to help Agency Offices in developing their own procedures, if they haven't already done so, to allow for consistent cross-Agency pre-dissemination reviews while meeting each office's particular needs. These pre-dissemination review guidelines provide non-binding internal policy and procedural guidance intended solely for EPA management and staff.

Systematic planning, typically part of a quality system, ensures that quality is built into information. The pre-dissemination review procedures outlined in this document are intended to provide assurance that quality has been built into the information we disseminate, rather than to add another review stage at the end of the information development process. Ultimately, such reviews reinforce good government and common sense.

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**Background**

EPA developed its Information Quality Guidelines in response to guidelines issued by OMB<sup>3</sup> pursuant to the 2001 Information Quality Act.<sup>4</sup> Within EPA, the Assistant Administrator for OEI has responsibility for the Agency's implementation of the IQG; within OEI, the Quality Staff's IQG Team manages IQG activities and responsibilities.

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<sup>1</sup> *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency*, (EPA 260R-02-008, October 2002, available at <http://www.epa.gov/quality/informationguidelines>).

<sup>2</sup> "Information," for the purposes of the IQG, generally includes any communication or representation of knowledge such as facts or data, in any medium or form. See Sections 5.3 and 5.4 of EPA's IQG.

<sup>3</sup> *OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* (67FR 8452, February 22, 2002, available at <http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf>).

<sup>4</sup> §515(a) of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658).

Both EPA's IQG and EPA's Quality System, which is implemented under EPA Order 5360.1 A2,<sup>5</sup> provide guidance for assuring the quality of the information EPA disseminates. As the Quality System policies and guidance documentation are updated, IQG concepts will be incorporated; both the IQG and Quality System ensure quality information.

The Action Development Process (ADP)<sup>6</sup> is another mechanism established by EPA to ensure that the Agency uses quality information to support its actions and that scientific, economic, and policy issues are adequately addressed at the proper stages in action development. These pre-dissemination review guidelines are not intended to override or preclude any steps in that process. Stakeholder and public involvement during action development enhances EPA's efforts to ensure information quality. Agency Offices can apply pre-dissemination reviews to information to ensure that it to fulfill the purposes of the IQG prior to distribution for public comment.

One of the elements of pre-dissemination review that may be appropriate for some types of information is peer review. In December 2004, OMB published the Final Information Quality Bulletin for Peer Review,<sup>7</sup> which establishes guidance aimed at enhancing the practice of peer review of government science documents. In addition, EPA's Office of Research and Development (ORD) has updated the Peer Review Handbook (3<sup>rd</sup> Edition).<sup>8</sup> ORD is responsible for managing EPA's peer review process. Offices should consider the role of peer review as a component of their pre-dissemination review procedures.

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### **Suggestions for Agency Offices in Developing or Modifying their Pre-Dissemination Review Procedures**

Agency Offices are encouraged to work with OEI staff and the broader quality assurance community as they develop pre-dissemination review procedures. For the purpose of developing pre-dissemination review procedures, OEI serves as a resource to Agency Offices and is available for consultations. Product review officers, web masters, records management officers, and other individuals having responsibility for approving public releases of EPA information can also provide valuable assistance. Below is a suggested process that Agency Offices may use or adapt to develop their own pre-dissemination review procedures. This suggested process incorporates elements from Agency Offices already instituting pre-dissemination review practices and is organized into four components of pre-dissemination review. The components are:

- A. Identification of types of information in development that may be disseminated when completed
- B. Development and refinement of review criteria
- C. Approval process for information prior to dissemination

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<sup>5</sup> EPA Order 5360.1 A2: Policy and Program Requirements for the Mandatory Agency-Wide Quality System (EPA May 2000, available at <http://www.epa.gov/QUALITY/qs-docs/5360-1.pdf> ).

<sup>6</sup> EPA's Action Development Process: Guidance for EPA Staff on Developing Quality Actions (EPA June 2004, available at <http://intranet.epa.gov.adplibrary/index.htm> ).

<sup>7</sup> Final Information Quality Bulletin for Peer Review (OMB, December 2004, available at <http://www.whitehouse.gov/omb/memoranda/fy2005/m05-03.pdf> ).

<sup>8</sup> Peer Review Handbook (3<sup>rd</sup> Edition) (EPA, May 2006, available at <http://www.epa.gov/peerreview/pdfs/Peer%20Review%20HandbookMay06.pdf> ).

- D. Establishment of records management practices for pre-dissemination review documentation and other pre-dissemination materials

**A) Identification of types of information that may be disseminated**

The optimum way to ensure that information is of adequate quality is to build in quality from the beginning, for example, by using guidance documents outlining “best practices.” Given the wide variety of activities within EPA that generate information, EPA’s challenge is to identify this information as early as possible so that systematic planning can be integrated into the development process, and quality incorporated during development.

Types of Information Likely to be Disseminated

To assist Agency Offices in the early identification of information to ensure and maximize quality, OEI has identified six types of information that generally comprise EPA’s dissemination activities; these are listed below. Additionally, OEI’s Quality Staff intends to share suggestions for identifying the various forms of information that may be disseminated, as they are developed.

- **Tools** – data query tools, models, estimator tools, mapping/GIS-related programs, products from these tools, and software used to analyze or evaluate data;
- **Reports** – analytical products that involve scientific, economic and technical information and that are endorsed or adopted by EPA (e.g., some journal articles, studies, trends analyses, public reports to Congress, strategic plans, annual reports, criteria documents, assessment documents, Integrated Risk Information System summaries, EPA published reports);
- **Data** – results from models, scientific data, maps (including GIS coverage), databases, spreadsheets, and flat files generated by EPA or data from a third party that EPA adopts or endorses; the disseminated products in this category do NOT include all public filings, such as adverse health effects information or Toxics Release Inventory data;
- **Information contained in EPA policy and guidance documents** – policies and guidance that are disseminated to the public, subsequent guidance on implementing policies, training materials, user guides/manuals, methodology documents such as test methods;
- **Outreach or communication products or broad audience information resources** – brochures, bulletins, flyers, videotapes, action plans, strategic plans, citizen guides, handbooks, newsletters, conference summaries posted on the EPA Web site, educational aids, and similar products; and
- **Information that is disseminated in support of an EPA rulemaking** – information used to support regulatory actions, such as advance notices of proposed rulemaking, proposed rules, final rules, regulatory impact analyses, risk assessments, responses to public comments, *Federal Register* notices.

When information is created, its intended use(s) can determine whether the information will be “disseminated” and therefore should undergo pre-dissemination review. The following set of questions may be useful for determining whether a pre-dissemination

review should occur.<sup>9</sup> Once items are identified as information intended for future dissemination, the information development process should then ensure and maximize the quality principles of the IQG.

*Is the work product “information?”*

“Information” generally includes any communication or representation of knowledge or position/policy such as facts or data, in any medium or form. This includes conclusions or facts drawn from or based upon other, existing information (secondary uses of information). Information that is adopted, endorsed, or used by EPA to support an Agency decision or position is generally considered “information” for the purposes of the IQG and should be subject to pre-dissemination review.

*When is information “disseminated?”*

In general, for purposes of the IQG, EPA disseminates information to the public when the Agency initiates or sponsors the distribution of information to the public. For a more detailed description and a sample of types of information that would not generally be considered disseminated by EPA, refer to Section 5.4 of the Guidelines

**B) Developing and refining review criteria for disseminated information**

Another suggested component of a pre-dissemination review procedure is the development and refinement of review criteria for the quality of disseminated information. As Agency Offices develop pre-dissemination review procedures, they should keep in mind the performance goals for disseminated information that EPA articulated as part of the IQG. Disseminated information should adhere to a basic standard of quality, including objectivity, utility, and integrity, and the principles of information quality should be integrated into each step of EPA’s development of information, including its creation, collection, maintenance, and dissemination. These performance goals reflect EPA’s expectation that the information it creates will conform to applicable quality standards and will adhere to applicable approved quality criteria. The IQG also describe EPA’s policy that all information EPA distributes is transparent regarding data sources and data limitation and meets a basic standard of information quality and that the utility, objectivity, and integrity of that information should be appropriate to the nature and timeliness of the planned and anticipated uses. Pre-dissemination review procedures should incorporate EPA’s goals and policy regarding review criteria for disseminated information.

**C) Process for approval of information prior to dissemination**

Pre-dissemination review procedures should also contain a process for the approval of information by the appropriate level of Agency management prior to dissemination. The process of document approval can be quite complex. Multiple forms and mechanisms for review and approval of Agency documents already exist. Some examples are legal reviews, peer reviews, programmatic reviews, scientific and technical review clearance processes, stakeholder reviews, and product review in accordance with the Office of Public Affairs guidelines. Additionally, some approval processes call for the

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<sup>9</sup> *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency*, Section 5.

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incorporation of pre-dissemination review from the concept stage, such as Quality Assurance Project Plan reviews and approvals under the Quality Management Plan. Your Agency Office may choose to retain existing processes or create a new procedure that consolidates your Pre-Dissemination Review with some or many of the Agency's existing approval processes.

As noted earlier, this suggested process for pre-dissemination review is intended to complement, enhance, and be consistent with the Agency's ADP guidance.

**D) Records Management Process for Pre-Dissemination Review**

An Agency Office's procedures for pre-dissemination review should specify how the office retains pre-dissemination review records. Agency Offices should follow existing Agency policies and practices for records retention. Different categories of information may have different record keeping requirements.